

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JUANITA ROMERO,

PLAINTIFF,

CIVIL ACTION NO. 2:07-cv-00936-MEF

V.

HYUNDAI MOTOR MANUFACTURING
ALABAMA, LLC,

DEFENDANT.

REPORT OF PARTIES' PLANNING MEETING

1. ***Appearances:***

Pursuant to Fed. R. Civ. P. 26(f), a meeting of the parties' representatives was held on December 20, 2007, and was conducted by:

a. Appearing on behalf of plaintiff:

David R. Arendall, Esq.

b. Appearing on behalf of defendant:

Scott Kelly, Esq.

2. ***Pre-Discovery Disclosures.*** The parties will exchange by January 18, 2008, the information required by Fed. R. Civ. P. 26(a)(1).

3. ***Discovery Plan.*** The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects:

a. ***Plaintiff's Statement:*** Conduct discovery on all aspects of Plaintiff's

Complaint and Defendant's defenses.

b. ***Defendant's Statement:*** Plaintiff's overall employment history; Plaintiff's employment with Defendant; the allegations contained in Plaintiff's Complaint; Plaintiff's efforts to seek employment after termination; Plaintiff's employment since termination; and Plaintiff's alleged damages.

c. ***Discovery cut-off.*** Unless modified by the Court for good cause shown, all discovery must be commenced in time to be completed by October 15, 2008.

4. ***Discovery Limitations:***

a. Unless modified by stipulation of the parties:

Depositions:

Each party agrees: Maximum of 8 depositions for the plaintiff and 8 depositions for the defendant with a maximum time limit of 7 hours per deposition, unless extended by agreement of the parties.

Interrogatories (the parties do not agree on the limitations on interrogatories):

Plaintiff's position: Maximum of 45 by each party, with responses due within 30 days after service.

Defendant's position: Maximum of 25 by each party with responses due within 30 days after service.

Request for Admission:

Each party agrees: Maximum of 25 by each party, with responses due within 30 days after service.

Request for Production (the parties do not agree on the limitations on requests for production):

Plaintiff's position: Maximum of 45 by each party, with responses due within 30 days after service.

Defendant's position: Maximum of 25 by each party, with responses due within 30 days after service.

Supplementation:

Each party agrees: Supplements under Rule 26(e), Fed. R. Civ. P., are due 30 days before the close of discovery.

5. ***Parties and Pleadings:***

- a. The plaintiff shall have until June 30, 2008, to join any additional parties and amend the pleadings.
- b. The defendant shall have until July 31, 2008, to join any additional parties and amend the pleadings.

6. ***Dispositive Motions:***

All potentially dispositive motions must be filed September 26, 2008.

7. ***Expert Testimony:***

Unless modified by stipulation of the parties, the disclosure of expert witnesses -- including a complete report under Fed. R. Civ. P. 26(a)(2)(B) from any specially retained or employed expert are due:

- a. From the plaintiff: 30 days prior to trial
- b. From the defendant: 30 days prior to trial

8. ***Pre-trial conference:***

This case will be ready for pretrial conference in December of 2008.

9. ***Trial:***

This case will be ready for trial by first trial available date in 2009¹.

¹ At the time the parties filed this Report, the Court had not published its trial schedule for 2009.

Trial is expected to last 2-3 day(s).

10. ***Final lists:***

Final lists of trial witnesses and exhibits under Fed. R. Civ. P. 26(a)(3) must be served and filed:

a. By the plaintiff: 30 days prior to trial

b. By the defendant: 30 days prior to trial

Objections are to be filed within 14 days after receipt of final lists.

11. ***Scheduling Conference:***

The parties do not request a scheduling conference prior to the entry of the Scheduling Order.

ATTORNEY FOR PLAINTIFF:

/s/ David R. Arendall

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/s/ Scott Kelly

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